



HINSHAW & CULBERTSON LLP

Attorneys at Law

151 North Franklin Street

Suite 2500

Chicago, IL 60606

312-704-3000

312-704-3001 (fax)

www.hinshawlaw.com

May 6, 2024

Via ECF

Hon. James R. Cho
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Joseph, et al. v. Frontier Airlines, Inc.*
Case No. 1:21-cv-06054-WFK-JRC

Dear Magistrate Judge Cho:

Pursuant to the Minute Order issued by this Court on February 5, 2024, the Parties hereby submit a joint status report regarding discovery with notification as to whether they would like referral to Court-annexed mediation or a settlement conference at that time.

Discovery: Below is a summary of the Parties' recent discovery efforts:

On December 13, 2023, Frontier served its First Set of Interrogatories and Requests for Production of Documents. Plaintiffs have successfully served their responses to Frontier's written discovery. While there are some remaining disputes regarding Plaintiffs' responses to Frontier's written discovery, the parties anticipate resolving such disputes without the need for Court intervention.

On May 6, 2024, Frontier served amended notices of deposition of the adult Plaintiffs to proceed on dates between May 21, 2024, and May 30, 2024.

In addition, Frontier filed a Joint Motion for Protective Order on March 19, 2024, which the Court granted that same day.

Settlement Conference: The Parties have conferred regarding a potential referral to Court-annexed mediation or an in-person settlement conference with the Court. At this time, the Parties believe it is premature to engage in mediation or a settlement conference with the Court. As discovery progresses, the Parties will consider whether a referral is appropriate and advise the Court accordingly.

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Respectfully submitted,

/s/ Dov Medinets

ATTORNEY FOR PLAINTIFFS

Dov Medinets
Gutman Weiss P.C.
2276 Sixty-Fifth Street, 2nd Floor
Brooklyn, NY 11204
Telephone: (718) 259-2100
dm@gwpclaw.com

/s/ Brian T. Maye

ATTORNEYS FOR DEFENDANT

Brian T. Maye (Admitted *Pro Hac Vice*)
Kristin A. Hoffman (Admitted *Pro Hac Vice*)
Hinshaw & Culbertson LLP
151 N. Franklin Street, Suite 2500
Chicago, Illinois 60606
Telephone: (312) 704-3000
bmaye@hinshawlaw.com
khoffman@hinshawlaw.com

&

Evan Kwart
800 Third Avenue, 13th Floor
New York, NY 10022
Telephone: (212) 655-3839
ekwart@hinshawlaw.com

cc: Attorneys of Record via ECF